

# EXHIBIT C



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February 10, 2021

**VIA EMAIL**

Venable LLP  
Jonathan M. Sharret  
1270 Avenue of the Americas  
24<sup>th</sup> Floor  
New York, NY 10020  
JSharret@Venable.com

Re: *Scorpcast, LLC dba HaulStars v. Boutique Media, et al., 2:20-cv-00193-JRG*

Mr. Sharret,

As we have said before, your letters are wrong on the law and wrong on the facts. Most telling, you are refusing to address the facts and have failed to respond to a single one of our questions. I will repeat them here:

- Does Manica Media deny that it owns any of the 26 websites/channels [listed in the January 28 letter]?
- Does Manica Media deny that it operates any of them?
- Does Manica Media deny that it receives money from the operation of any of them?
- Does Manica Media deny that it or its affiliates upload videos to any of them or is otherwise associated with them?

Your refusal to respond to these questions is an admission that Manica Media does infringe and is trying to ignore the facts. These questions are not “irrelevant” as your letter claims; they instead speak directly to Manica Media’s direct and indirect infringement of the asserted claims and associated liability. Moreover, you continue to attempt to improperly limit the statements in your letter to the “Pornhub” website, but that is only a fraction of the infringing activity that Manica Media engages in.

If you continue to disagree, respond to our questions and we can assess actual facts as opposed to your attorney ipse dixit.

We look forward to a substantive, factual response to our questions.

Sincerely,

A handwritten signature in black ink, appearing to be 'J. Hardt', written in a cursive, stylized script.

Jonathan Hardt